

**REMARKS**

This amendment amends claim 1 and adds new claims 12-13. Support for the amendment can be found, e.g., at Figures 3 and 5 and page 6, lines 1-17. Claims 12 and 13 are a rewritten version of dependent claims 3 and 6, which the Examiner indicates containing allowable subject matter.

At pages 2-3 of the final Office Action, the Examiner rejects claims 1 and 7-11 under 35 U.S.C. 102(b) as being anticipated by Applicant's Admitted Prior Art (APA). At page 4, claims 2 and 4-5 under 35 U.S.C. 103(a) as being unpatentable over APA. At pages 4-6, claims 1 and 7-11 under 35 U.S.C. 103(a) as being unpatentable over Miwa (US 6,512,557 B1). At pages 6-7, claims 4-5 are rejected under 35 USC 103(a) as being unpatentable over Miwa. These rejections are respectfully traversed.

APA and Miwa, standing alone or in combination, fail to disclose, teach, or suggest, *inter alia*, the following features recited by claim 1 of the present application:

"a reflector disposed along the light receiving lateral side, said reflector having a reflective cover, an opening, a first holder, and a second holder, the opening positioned toward the light receiving lateral side, the first holder extending toward the first coupling lateral side and the second holder extending toward the second coupling lateral side, the first holder having a first linking member, and the second holder having a second linking member"; and

"wherein the first and second coupling members are respectively directly combined with the first and second linking members for assembling the reflector and the light guide plate, and a predetermined distance is formed between the light source and the light guide plate".

APA teaches the light guide plate (40) of APA is combined with the reflector (30) through the frame (10) but not directly combined with the reflector (30). The Examiner states the elements 42 and 15 of APA are read as the first and second coupling members of claim 1 and the elements 35 are read as the first and second linking members of claim 1 (at pages 2-3 of the Office Action). The Applicant disagrees. The elements 42 of APA are not directly combined with the elements 35, but directly combined with the grooves (12) of the frame (10). Also, if only the elements 15 directly combined with the elements 35, the reflector (30) cannot be assembled with the light guide plate (40). Thus, APA does not teach "wherein the first and second coupling members are respectively directly combined with the first and second linking members for assembling the

reflector and the light guide plate, and a predetermined distance is formed between the reflector and the light guide plate", as recited by amended claim 1 of the present application.

Turning to the rejection of claim 1 under 35 U.S.C. 103(a) as being unpatentable over Miwa, the Examiner basically asserts that Miwa teaches all elements of claim 1 except that Miwa does not appear to explicitly specify that the reflector has a first holder and a second holder, the opening positioned toward the light receiving lateral side, the first holder extending toward the first coupling lateral side and the second holder extending toward the second coupling lateral side, the first holder having a first linking member, and the second holder having a second linking member. The Examiner, however, asserts that it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify the reflector since it has been held that rearranging parts of an invention involves only routine skill in the art, which relies upon *In re Japikse*, 86 USPQ 70, wherein the court considered shifting the position of a starting switch to not be a patentable distinction because shifting the position of the starting switch would not have modified the operation of the device.

Claim 1 requires that the first and second coupling members are respectively directly combined with the first and second linking members of the reflector along the first and second coupling side of the light guide plate for assembling the reflector and the light guide plate. However, Miwa teaches the optical guide plate (8), the light source lamp (10) and the reflector (12) are all secured on the chassis (11) but not directly combining the optical guide plate (8) with the reflector (12). In fact, this difference is much more than a routine skill, rearranging parts of an invention, in the art. Instead, this difference modifies the operation of the backlight unit for a liquid crystal display. If the optical guide plate (8) and the reflector (12) are not directly combined, the distance between the optical guide plate (8) and the lamp (10) may not be the predetermined distance and can affect the luminance uniformity of the LCD, because the optical guide plate (8) near the lamp (10) will expand at hot condition and shrink at cold condition. (Please refer to the problem stated at page 2 lines 4-23 of the present application)

The Applicant disagrees with reading the elements 14 of Miwa as the first and second linking members of claim 1 (at page 5 of the Office Action), because the reflector (12) does not have the elements 14, see FIG. 2. Thus, Miwa does not teach "a reflector ... having ...a first holder, and a second holder ...the first holder having a first linking member, and the second holder having a second linking member", as recited by amended claim 1 of the present application.

Due to the reasons stated above, it is therefore Applicant's belief that claim 1 is allowable over the cited reference. Claims 2-11 are also patentable, at least by virtue of their dependency from claim 1.

The Applicants have attempted to address all of the issues raised by the Examiner in the Office Action as the Applicants understand them. It is believed that the application is now in condition for allowance. If any point requires further explanation, the Examiner is invited to telephone Troy Cai at (323) 934-2300 or e-mail Troy Cai at [tcai@ladasperry.com](mailto:tcai@ladasperry.com).

The Commissioner is authorized to charge any additional fees which may be required or credit overpayment to deposit account No. 12-0415. In particular, if this response is not timely filed, then the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136 (a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 12-0415.

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August 23, 2004

(Date of Deposit)

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(Name of Applicant, Assignee or Registered Representative)

  
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Respectfully submitted,

  
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